

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 19-20772

v.

HON. TERRENCE G. BERG

MATTHEW MERCER-KINSER,

Defendant.

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**THE UNITED STATES' NOTICE  
UNDER FEDERAL RULE OF EVIDENCE 414**

The United States hereby gives notice to the defendant, pursuant to Federal Rule of Evidence 414, that it will seek to introduce, through the testimony of witnesses and documentary evidence, that in 2009, the defendant was convicted of transportation of child pornography, in violation of 18 U.S.C. §2252A(a)(1), in the case of *United States v. Matthew Mercer-Kinsler*, 09-20001 (E.D. Mich.) (Cleland, J.).

As for the expected testimony, the government intends to offer a copy of the prior charging document, judgment, and any stipulated facts from the plea agreement in that case.

Respectfully submitted,

SAIMA S. MOHSIN  
Acting United States Attorney

s/ Erin S. Shaw  
Erin S. Shaw  
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Dated: August 2, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2021 I caused THE UNITED STATES' NOTICE UNDER FEDERAL RULE OF EVIDENCE 414 to be electronically filed with the Clerk of the United States Court for the Eastern District of Michigan using the ECF system, and that copies of this filing will be served electronically to all counsel of record.

/s/ *Erin S. Shaw*  
Assistant United States Attorney